

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

DOMINIQUE J. WALDEN, )  
Plaintiff, )  
v. )  
 )  
 )  
 )  
EQUIFAX INFORMATION SERVICES, LLC, )  
EXPERIAN INFORMATION SOLUTIONS, )  
INC., TRANS UNION, LLC, LVNV FUNDING )  
LLC and )  
NAVY FEDERAL CREDIT UNION, )  
Defendants. )  
 )  
Civil Action No.: 3:24-cv-00317-DJN

**CONSENT MOTION TO ENLARGE TIME**

COMES NOW Defendant LVNV Funding, LLC (“LVNV”), by counsel, with the agreement of Plaintiff’s counsel, and move this Court for a twenty-one (21) day extension of time from June 5<sup>th</sup>, 2024, through and including June 26<sup>th</sup>, 2024, to submit a response to Plaintiff’s Complaint, based on good cause, including existing heavy caseloads of counsel and the parties’ continuing efforts to explore the potential for early resolution while minimizing litigation expenses, and diminishing the burden on the Court. A draft Agreed Order is submitted herewith.

Respectfully submitted,

*/s/ Brittany Given Simmons*  
Brittany Given Simmons (Virginia Bar # 94196)  
Dinsmore & Shohl LLP  
801 Pennsylvania Ave, N.W., Suite 610  
Washington, DC 20004  
(202) 372-9116  
Brittany.Simmons@dinsmore.com  
*Counsel for Defendant, LVNV Funding, LLC*

## CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of June, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to the following:

Jason M. Krumbein, Esq. (VSB # 43538)  
1650 Willow Lawn Drive, Suite 201  
Richmond, VA 23230  
804.592.0792  
804.823.2565 (fax)  
[JKrumbein@KrumbeinLaw.com](mailto:JKrumbein@KrumbeinLaw.com)  
*Counsels for Plaintiff, Dominique J. Walden*

/s/ Brittany Given Simmons  
*Counsel for Defendant, LVNV  
Funding, LLC*